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By Mail & ECF

November 29, 2012

STANLEY R. GOODMAN
MARTIN I. SAPERSTEIN

Hon. Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Innovation Ventures, LLC, et al. v. Ultimate One
Distributing Corp., et al. 12 Civ. 5354

Dear Judge Matsumoto:

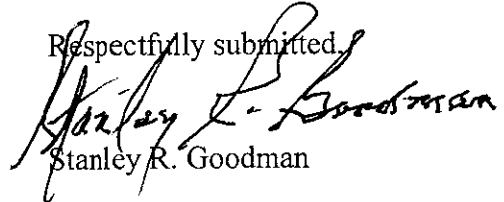
Our firm represents Defendants Food Distributors International, Inc. ("FDI") and Scott Tilbrook, in the above referenced matter. In accordance with the Court's November 28, 2012 Order, we respectfully renew our application for an extension of time with regard to the Preliminary Injunction hearing scheduled for November 30, 2012 to December 14, 2012 at 10:00 A.M. As stated in our November 28, 2012 letter to the Court, we have spoken with Plaintiffs' counsel, Geoffrey Potter, Esq. and he has graciously consented to a resetting of the Preliminary Injunction hearing with respect to the aforementioned Defendants to any date convenient to the Court. We intend to submit papers limited to the Asset Freeze imposed by the Court upon FDI in its Order To Show Cause, which can be terminated or modified only by further order. In this regard Defendants consent to the extension of the temporary restraining order issued November 6, 2012, until the new hearing date.

According to the Court docket, the Order To Show Cause was issued on November 6, 2012. On November 16, 2012, Plaintiffs filed a Certificate of Service of the Order To Show Cause upon Defendants' local counsel in Florida via email. We were retained thereafter and filed our Notice of Appearance on November 19, 2012. With a short week and having other matters, we could not file opposition papers by noon, November 21, 2012. Since our appearance we have been attempting to work out a Stipulation with Plaintiff's counsel.

In view of the foregoing we respectfully request that the Court adopt the schedule set forth in its November 28th Order, namely, Defendants' opposition papers by noon on December 4, 2012, Plaintiffs' reply papers by noon on December 10, 2012 and the Show Cause Hearing as to

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Defendants FDI and Scott Tilbrook to be held December 14, 2012 at 10:00 A.M. In the meanwhile we will continue our endeavors with Plaintiffs' counsel to enter into an agreed to Stipulation, so that the hearing will not be necessary. Thank you.

Respectfully submitted,

Stanley R. Goodman

cc: All counsel of record via ECF